



Momentive Performance Materials Inc.
10851 Energy Highway
Friendly, WV 26146
momentive.com

January 30, 2020

FED EX: 7776 4434 4345

Mr. Kenan Cetin
Project Manager, RCRA Corrective Action
Division of Water and Waste Management (DWWM)
West Virginia Department of Environmental Protection (WVDEP)
131A Peninsula Street
Wheeling, WV 26003

Re: 2019 Semiannual Corrective Action Update
MPM Silicones, LLC – Sistersville Plant
EPA ID No. WVD004325353

Dear Mr. Cetin:

This letter report is MPM Silicones, LLC's semiannual corrective action update for the reporting period of July 1, 2019 through December 31, 2019 as specified in the above referenced hazardous waste management renewal permit, module X, section H-1 which became effective July 31, 2018.

1. Introduction:

The Permit requires the following corrective actions at the Facility:

Permit Reference	Corrective Action Area	Corrective Action Requirements
G-3b	North Inactive Site	Earthen cover inspection & maintenance Annual groundwater monitoring
G-3c	South Inactive Site	Ground cover inspection Semi Annual groundwater monitoring
G-3d	Waste Water Treatment System	Equipment inspection Surface impoundment leak rate monitoring
G-3e	Sludge Pond and BTEX Area	Groundwater recovery well operation Semi Annual groundwater monitoring

2. Work Completed During the Reporting Period:

Activities during the Reporting Period relating to these corrective actions are described below.

G-3b North Inactive Site – The earthen cover, diversion ditches and the banks of Sugar Camp Run were last inspected on October 11, 2019. Analytical results will be reported in the annual corrective action report as specified in Section H-2 of Module X. Annual groundwater sampling was completed the week of May 19th. Mowing of North Inactive Site was completed in October.

G-3c South Inactive Site – Semiannual groundwater sampling and inspection of the ground cover were completed the week of August 18th. Analytical results will be reported in the annual corrective action report as specified in Section H-2 of Module X. Mowing of South Inactive Site was completed in October.

G-3d Waste Water Treatment System – The permit requires reporting and additional actions if the monthly average leakage rate exceeds 750 gallons per day for the collection sumps of either surface impoundment (reviewed weekly). Both sumps averaged less than 147 gallons per day during this period.

The East UNOX was shut down for inspection in October.

G-3e No.3 Sludge Pond and BTEX Area – Semiannual groundwater sampling was completed the week of August 18th. Analytical results will be reported in the annual corrective action report as specified in Section H-2 of Module X.

3. Summary of findings:

G-3b, G-3c & G-3e – No findings this period.

G-3d Wastewater Treatment System – Both of our surface impoundment collection sumps averaged less than 147 gallons per day (on a monthly basis) during the reporting period.

4. Changes made during the reporting period:

G-3b, G-3c, G-3d and G-3e – No changes were made during the reporting period.

5. Problems encountered, and actions taken to rectify problems:

G-3b, G-3c and G-3d – No problems were encountered during the reporting period.

6. Changes in Facility Personnel:

G-3b, G-3c, G-3d and G-3e – No changes in facility personnel.

7. Projected Work During the Next Reporting Period:

G-3b North Inactive Site – Work next period (January - June) will include scheduled inspections of the earthen cover, diversion ditches and the banks of Sugar Camp Run. Mowing of the North Inactive Site is scheduled for June. Annual groundwater monitoring is tentatively scheduled for the week of May 10, 2020

G-3c South Inactive Site – Work next period (January - June) will include scheduled inspection of ground cover and semiannual groundwater monitoring scheduled for the week of March 8th, 2020. Mowing of the South Inactive Site is scheduled for June.

Mr. Kenan Cetin

Page 3

G-3d Wastewater Treatment System – Work next period (January - June) will include continued weekly evaluation of monthly average leakage rates for the surface impoundments.

Annual cleaning and inspection of the surface impoundments is scheduled for the second quarter 2020. The West primary clarifier will be shut down for inspection in April.

G-3e No.3 Sludge Pond and BTEX Area – Work next period (January - June) will include continued operation of the groundwater recovery well. Semiannual groundwater monitoring is scheduled for the week of March 8th, 2020.

As required by Condition I-I of our permit, the following certification is being made:

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

If you have any questions concerning this report, please contact Vic Cwynar at (304) 652-8612 or by email at victor.cwynarjr@momentive.com.

Sincerely,
MPM SILICONES, LLC



Luiz Mello
Sr. Director of Operations

cc: Jason Martin - MPM
Steve Freed - MPM
Sanat Bhavsar - MPM
Paul Z. Meyer- Chemtura
Talal Fathallah - WVDEP
Sudhir Patel - WVDEP
Cecil Rodrigues - USEPA
State Correspondence File